



Advocates for Workplace Fairness

December 13, 2022

Via ECF:

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ulku Rowe v. Google LLC, Case No. 19-cv-08655

Dear Judge Schofield:

We represent the Plaintiff, Ulku Rowe in the above-referenced matter and write on behalf of all parties. Pursuant to Rule I.B.2 of Your Honor's Individual Rules, we write to request a brief three-week extension of time to complete expert discovery. Per the current schedule (ECF No. 231), Plaintiff submitted her expert report on November 18, 2022 and Defendant has represented that it will not be submitting a rebuttal expert report. Due to conflicts related to the scheduling of Plaintiff's expert deposition and in light of the new April 17, 2023 trial date, the parties respectfully request a slight modification of the expert discovery schedule:

Description	Current Deadline	Proposed Deadline
Deadline for parties to file motion related to expert discovery	December 30, 2022	January 20, 2022
Deadline for party to oppose motion related to expert discovery	January 6, 2023	January 27, 2022

This is the parties' first request for an extension of the expert discovery schedule and all parties consent. We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Cara E. Greene

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cc: All Parties (via ECF)